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*Counsel for Arba Group*

**UNITED STATES BANKRUPTCY COURT  
 EASTERN DISTRICT OF NEW YORK**

	)	Chapter 11
	)	
	)	
In re:	)	Case No. 19-76260 (AST)
	)	Case No. 19-76263 (AST)
	)	Case No. 19-76267 (AST)
Absolut Facilities Management, LLC, <i>et al.</i> ,	)	Case No. 19-76268 (AST)
	)	Case No. 19-76269 (AST)
Debtors. <sup>1</sup>	)	Case No. 19-76270 (AST)
	)	Case No. 19-76271 (AST)
	)	Case No. 19-76272 (AST)
	)	
	)	(Joint Administration Requested)

**NOTICE OF APPEARANCE AND DEMAND FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that Arba Group and its affiliates (collectively, the “Landlords”<sup>2</sup>), by and through their counsel, Arent Fox LLP, hereby appear in the above-captioned cases pursuant to Section 1109(b) of Title 11 of the United States Code (the “Bankruptcy Code”)

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, are: Absolut Facilities Management, LLC (1412); Absolut Center for Nursing and Rehabilitation at Allegany, LLC (7875); Absolut Center for Nursing and Rehabilitation at Aurora Park, LLC (8266); Absolut Center for Nursing and Rehabilitation at Gasport, LLC (8080); Absolut at Orchard Brooke, LLC (1641); Absolut Center for Nursing and Rehabilitation at Orchard Park, LLC (8300); Absolut Center for Nursing and Rehabilitation at Three Rivers, LLC (8133); and Absolut Center for Nursing and Rehabilitation at Westfield, LLC (7924).

<sup>2</sup> The Landlords are 292 Main Street, LLC; 6060 Armor Road, LLC; 2178 N. Fifth Street, LLC; 101 Creekside Drive, LLC; 4540 Lincoln Drive, LLC; and 26 Cass Street, LLC.

and Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and hereby request that copies of all notices and pleadings given or filed in the above-captioned cases be given and served upon the persons listed below at the following address, telephone and facsimile numbers and e-mail addresses:

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PLEASE TAKE FURTHER NOTICE that pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral and whether transmitted or conveyed by mail, e-mail, facsimile, telephone, telegraph, telex, or otherwise filed or made with regard to the above-captioned cases and proceedings therein.

PLEASE TAKE FURTHER NOTICE that the undersigned intends that neither this Notice of Appearance and Demand for Service of Papers nor any later appearance, pleadings, claim or suit shall be deemed or construed to be a waiver of the rights of the Landlords: (1) to have final orders in noncore matters entered only after de novo review by a District Judge, (2) to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases, (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) or any other rights, claims, actions, setoffs, or recoupments to

which the Landlords are or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments the Landlords expressly reserve.

Dated: September 12, 2019  
New York, New York

ARENT FOX LLP

*Counsel to Arba Group*

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